I am a licensed Amateur Radio Operator; my call sign is W3JJH.

The key to the BPL issue is found in the last sentence of the Commission's Notice of Inquiry: "Each of these authorized services in the spectrum must be protected from harmful interference."

I cannot provide the Commission with a specific suggestion for test methods and maximum radiated signal levels necessary to protect the Amateur Radio Service. However, I offer the following observations which may be useful.

First, the maximum permissible radiated level in the HF spectrum allowed by Part 15.209 of Commission's Rules is 30 uV/m measured at 30 m. My station is located on a 0.4 acre lot with medium power lines on three sides. There is no place on my property that is 30 m away from a power line. Any one of these lines radiating a signal at the current permissible level would jam the signal from any but the most powerful amateur stations nearby. Communication with another state or continent would be essentially impossible.

Second, there are many areas where it would be difficult to maintain significantly more than 3 m separation between the antenna on a motor vehicle and a utility line. The present standard of 100 uV/m @ 3 m for VHF will not be adequate to protect public safety communications in the low VHF range.

It is clear that if BPL can be deployed in the real world, the FCC must tighten the radiated signal requirements in Part 15. Otherwise, many licensed users will be driven off the air by the electromagnetic smog caused by PBL.